

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

IN RE NEW ENGLAND COMPOUNDING PHARMACY CASES LITIGATION	MDL No. 2419 Master Docket No. 12-cv-12052 (FDS)
THIS DOCUMENT RELATES TO: All Actions	

**JOINTLY PROPOSED AGENDA
FOR THE MARCH 12, 2013 STATUS CONFERENCE**

Plaintiffs, Ameridose LLC, and New England Compounding Pharmacy, Inc. (through both the Trustee and counsel) jointly propose the following agenda for the March 12, 2013 status conference:¹

1. Update on proceedings in bankruptcy court
2. Status of docket (in MDL and on pending CTOs)
3. Establishing a plaintiffs' leadership structure
4. Coordination with other courts
5. Pending motions and deadlines
 - a. Trustee's motion to Motion to Transfer Personal Injury Tort and Wrongful Death Cases (Dkt. No. 37)
 - b. Ameridose's motions to withdraw the reference (*e.g.*, 13-cv-10226, Dkt. No. 1)
 - c. GDC's motion to withdraw the reference (Dkt. No. 30)
 - d. Alaunus's motions to dismiss (*e.g.*, Dkt. No. 33)
 - e. Motions to remand
6. Master complaint

¹ Liaison counsel for the individual defendants did not respond to requests for comment on this agenda.

7. Timing of class action briefing, if any
8. Timing of Rule 26(f) conference, Rule 16 conference, and initial disclosures
9. Discovery or stay?
 - a. Product ID records
 - b. Discovery as to Ameridose or stay?
 - c. Discovery as to the individual defendants
 - d. Discovery of other defendants
 - e. Deadline to add defendants?
 - f. Protective Order
 - g. Electronically Stored Information (ESI) protocol

Dated: March 12, 2013

Respectfully submitted,

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*Chapter 11 Trustee for the Estate of New
England Compounding Pharmacy, Inc.*

CERTIFICATE OF SERVICE

I, Kristen Johnson Parker, hereby certify that I caused a copy of the above Jointly Proposed Agenda for the March 12, 2013 Status Conference to be filed electronically via the Court's electronic filing system. Those attorneys who are registered with the Court's electronic filing system may access these filings through the Court's system, and notice of these filings will be sent to these parties by operation of the Court's electronic filing system.

Dated: March 12, 2013

/s/ Kristen Johnson Parker

Kristen Johnson Parker, BBO No. 667261